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March 1, 2023

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS EL PASO DIVISION

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: MV

UNITED STATES OF AMERICA,

S Case No: EP:23-CR-00369-DCG

Plaintiff,

V. S CT 1: 21:846 & 841(a)(1)-Conspiracy to
Possess a Controlled Substance with Intent
to Distribute;

Defendant.

S CT 2: 21:841(a)(1)-Possession with Intent
to Distribute a Controlled Substance.

THE GRAND JURY CHARGES:

COUNT ONE

(21 U.S.C. §§ 846, 841(a)(1) & 841(b)(1)(C))

On or about January 31, 2023, in the Western District of Texas, Defendant,

ALEJANDRO GOMEZ,

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed with others to the Grand Jury known and unknown, to commit an offense against the United States, in violation of Title 21, United States Code, Section 846, that is to say, the Defendant conspired to possess a controlled substance, which offense involved methamphetamine, a Schedule II Controlled Substance, with intent to distribute same, contrary to Title 21, United States Code, Section 841(a)(1) and the quantity of methamphetamine involved in the conspiracy and attributable to Defendant as a result of Defendant's own conduct and as a result of the conduct of other conspirators reasonably foreseeable to Defendant is a quantity of a mixture or substance containing a detectable amount of methamphetamine, all in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(C).

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<u>COUNT TWO</u>
(21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C))

On or about January 31, 2023, in the Western District of Texas, Defendant,

ALEJANDRO GOMEZ,

knowingly and intentionally possessed with intent to distribute a controlled substance, which offense involved a quantity of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

> A TRUE BILL. FOREPERSON OF THE GRAND JURY

JAIME ESPARZA

Assistant United States Attorney